

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES, V. AFEEZ ADENIRAN))))))
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1:20-CR-00114-WMR-CCB

**RESPONSE TO AFEEZ ADENRIAN'S MOTION TO
REPLACE COUNSEL**

NOW COMES Holly A. Pierson, current counsel for Afeeze Adeniran, Defendant in the above-styled case, and responds to Mr. Afeeze's Motion to Dismiss and Replace Counsel (the "Motion"). Although the undersigned counsel disagrees with the substance of Mr. Adeniran's Motion, the relationship between Mr. Adeniran and counsel has deteriorated to a point where undersigned counsel does not believe that she can appropriately or adequately represent Mr. Adeniran. For that reason, undersigned counsel agrees with Mr. Adeniran's request that new counsel be appointed to represent Mr. Adeniran, showing this Court as follows :

1) Undersigned counsel has communicated regularly with Mr. Adeniran, as well as with other persons designated by Mr. Adeniran regarding his case. Undersigned counsel has also communicated on numerous occasions and met with AUSA Conners regarding Mr. Adeniran and his alleged role in this case, including

conversations regarding the specific evidence that the Government alleges is related to Mr. Adeniran, regarding potential bond for Mr. Adeniran despite Judge Anand's initial denial of the same, and regarding exploratory plea discussions. The substance of those conversations has also been communicated to Mr. Adeniran.

2) Undersigned counsel has also reviewed the discovery that the Government has identified as related to Mr. Adeniran in the case, as well as other discovery in the case to search for additional and/or exculpatory evidence.

3) It is the opinion of undersigned counsel, based upon her experience generally and in this case, that Mr. Adeniran is conflating the fact that he does not like or want to receive undersigned counsel's assessment of the applicable factual and legal points relevant to the most beneficial resolution of his case with a position that undersigned counsel has failed to master the facts or law pertinent to his case, which is simply not accurate.

4) Despite the inaccuracy of the facts alleged by Mr. Adeniran, undersigned counsel believes that the relationship has deteriorated to the point where her ability to represent Mr. Adeniran adequately and appropriately is compromised. Specifically, Mr. Adeniran has repeatedly been presented with factual information that would allow him to know and understand that his expressed viewpoint in the

Motion is inaccurate, and yet he quite clearly still holds to these erroneous beliefs, which greatly undermine the attorney-client relationship. Additionally, Mr. Adeniran has expressed his concern that because undersigned counsel is a former federal prosecutor and because she is court appointed (i.e., paid by the federal government), she is somehow in cahoots with the Government or otherwise not looking out for his best interests. And, Mr. Adeniran appears to hold undersigned counsel responsible for Judge Anand's denial of his bond and the events that have occurred thereafter, none of which are in undersigned counsel's control.

5) In short, although his concerns are incorrect or misplaced, the fact remains that Mr. Adeniran does not trust and, therefore, will not accept advice or counsel from, undersigned counsel. Undersigned counsel has attempted without success to address these issues, but the relationship is irrevocably broken at this point.

For all of the forgoing reasons, undersigned counsel supports Mr. Adeniran's request that new counsel be appointed to replace undersigned counsel in this case.

Respectfully submitted, this 13th day of July, 2021.

PIERSON LAW LLC

/s/ Holly A. Pierson

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CERTIFICATE OF SERVICE

I certify that I have filed the above RESPONSE TO DEFENDANT AFEEZ ADENIRAN'S MOTION TO REPLACE COUNSEL through the Courts electronic filing system, which will in turn serve all counsel of record.

This the 13th day of July, 2021.

PIERSON LAW LLC

/s/ Holly A. Pierson

Holly A. Pierson
Georgia Bar No. 579655